

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

DOCKET No.: 0209 6:20-CR-06140-002

VS.

RAEKWON GREEN  
A/K/A BUNDY  
A/K/A BUNDLES,

DEFENDANT.

**STATEMENT WITH REGARD TO  
SENTENCING FACTORS/PRESENTENCE  
INVESTIGATION REPORT**

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MICHAEL P. SCHIANO, ESQ., the attorney for the above Defendant, RAEKWON GREEN, has thoroughly reviewed the PreSentence Investigation Report ("PSI") prepared by U.S. Probation Officer Jessica Rider and in accordance with Rule 32(f) and (i)(4)(I) of the Federal Rules of Criminal Procedure and Sections (6)(A)(1.2) and (6)(A)(1.3) of the United States Sentencing Guidelines, hereby gives notice that the Defendant has no objection to the Presentence Investigation Report prepared on July 3, 2024, nor does the Defendant dispute the substantial factual representations contained therein about which the Defendant has no direct knowledge.

HOWEVER, we do concur with, and are respectfully asking the Court to consider, the recommendation from the Probation officer Ms. Rider that the Court may appropriately consider Mr. Green's lack of youthful guidance and the need to avoid unwarranted sentencing disparities on behalf of Mr. Green. I have attached a letter from Tamara Davis, Education Provider - Livingston County Jail setting forth training completed by Mr. Green while he was incarcerated in Livingston County Jail and a letter from Mr. Green wherein he accepts responsibility.

WE ARE RESPECTFULLY asking the Court to consider a non-guideline sentence

based upon the Defendant's age and based upon the nature of the offenses.

DATED: July 15, 2024

Respectfully submitted,



MICHAEL P. SCHIANO  
Attorney for Defendant Raekwon Green  
One East Main St., Suite 315  
Rochester, New York 14614  
Tel: (585) 546-7150

TO: Honorable Frank P. Geraci, Jr.  
U.S. District Court Judge  
United States District Court  
100 State Street  
Rochester, New York 14614

Robert Marangola, Esq.  
Assistant United States Attorney  
100 State Street, Suite 500  
Rochester, New York 14614

Jessica Rider  
U.S. Probation Officer  
100 State Street, Room 1200  
Rochester, New York 14614  
[jessica\\_rider@nywp.uscourts.gov](mailto:jessica_rider@nywp.uscourts.gov)

**LIVINGSTON COUNTY  
SHERIFF**



THOMAS J. DOUGHERTY, SHERIFF

MATTHEW D. BEAN, UNDERSHERIFF

September 8, 2022

To Whom It May Concern,

I am writing to inform you that Raekwon Green has completed the NYS DOT Flagging Certification. The training was held in August 2022 and will expire in 3 years. If you have any questions or concerns regarding this training feel free to reach me at [tdavis@gvboces.org](mailto:tdavis@gvboces.org) or at 585-243-7085.

Thank You,

*Tamara Davis*

Tamara Davis  
Education Provider  
Livingston County Jail

Dakwon Green

Dear Judge

GREETINGS, I HOPE ALL IS WELL TO YOU. I HOPE THAT YOU RECEIVE THIS LETTER IN A TIMELY MANNER, BEFORE THIS HONORABLE COURT. I'm ADDRESSING THE MATTERS OF MY POOR DECISION MAKING.

I WOULD FIRST LIKE TO APOLOGIZE FOR MY ACTIONS AND MY YOUNG MENTALITY. I KNOW I HAVE MADE A LOT OF POOR DECISION IN MY LIFE AND I COULD ADMITT I WAS EASILY INFLUENCED. I MAKE NO EXCUSE FOR MY NEGATIVE BEHAVIORS.

I'VE BEEN DOING A LOT OF SELF-REFLECTING DURING THIS INCARCERATION. I HAVE GROWN AND LEARNED MORE ABOUT MYSELF EACH DAY. I REALIZE THERE IS MORE TO LIFE THEN JUST THE STREETS OF ROCHESTER. NOT ONLY AM I SUFFERING BUT ALSO MY FAMILY. I HAVE A BEAUTIFUL YOUNG DAUGHTER THAT I PRAY, I MAKE IT HOME.

TO IN A TIME!! MANNER.

I LIVED THERE FOR I HAVE  
SET DOWN AND MANAGE THAT  
PATIENTS IS LONGEVITY. LONGEVITY IS  
THE KEY TO SUCCESS. NO MONEY IN  
THE WORLD IS NOT WORTH MY FREEDOM  
AND THE TIME AWAY FROM MY FAMILY.  
I'M READY TO BE A MAN, AND A PRODUCTIVE  
MEMBER TO OUR SOCIETY & ALSO A BETTER  
ROLE MODEL AND CARE PROVIDER.

HEALTHWISE BEEN DIAGNOSED  
AT A YOUNG AGE IN PRISON WITH  
HYPERTENSION AND HYPERTHYROID. I  
WOULD HAVE TO LOSE MY LIFE TO  
A JAIL CELL FOR BEING UNHEALTHY DUE  
TO MY POOR DECISION MAKING. THIS  
HAS BEEN AND FOR ME AND MADE A  
BIG IMPACT ON MY LIFE. I NO LONGER  
WANT THIS LIFESTYLE ANYMORE. I PRAY  
EVERY NIGHT FOR ANOTHER OPPORTUNITY  
FOR GIVENESS FOR MY ACTIONS. ON ANOTHER  
NOTE I WOULD LIKE TO APOLOGIZE TO  
THE VICTIMS FOR THE HORRIBLE EXPERIENCE,  
THE COURT AND MY FAMILY FOR MY  
BEHAVIOR.

IN CONCLUSION  
I WOULD GREATLY APPRECIATE IT.

III

IF you can FORGIVE MY BEHAVIOR AND  
GIVE ME ANOTHER CHANCE TO CORRECT  
MY WRONGS AND MAKE IT BACK HOME.  
most Daffinitely to my Beautiful daughter  
Before its to late. I can Daffinitely  
Promise You that I will be a better  
member to our community and  
Productive Provider. I will ensure  
you that you won't regret it  
because Your Court has made  
a positive change on this Defendant.  
I also plan on attending Re-Entry  
upon Release. So You can see the  
change yourself

I THANK YOU FOR  
ALL YOUR TIME AND CONSIDERATION  
IN THIS MATTER. I APPRECIATE THE  
HELP IF YOU CAN. GOD BLESS

Sincerely  
Rashawn Green  
P.S.

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VS.

RAEKWON GREEN  
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DEFENDANT.

AFFIDAVIT OF SERVICE ELECTRONICALLY AND BY MAIL

The undersigned hereby certifies that she is an employee in the Schiano Law Office, P.C. and is a person of such age and discretion as to be competent to serve papers.

That on July 15, 2024, she served a copy of the attached:

**STATEMENT WITH REGARD TO SENTENCING  
FACTORS/PRESENTENCE INVESTIGATION REPORT**

by electronic mail to U.S. District Court Judge Frank P. Geraci, Jr., Robert Marangola, Esq., AUSA and Jessica Rider, U.S. Probation Officer.

  
SALLY J. SKINNER

Sworn to before me this 15<sup>th</sup>  
day of July, 2024.

  
Notary Public

CHRISTOPHER SCHIANO  
Notary Public, State of New York  
No. 02SC4977203  
Qualified in Monroe County  
Commission Expires January 26, 2024

CHRISTOPHER SCHIANO  
Notary Public, State of New York  
No. 02SC4977203  
Qualified in Monroe County  
Commission Expires January 26, 2024